

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

IN THE MATTER OF:

**JOSEPH DuMOUCHELLE and
MELINDA J. ADDUCCI,**

Joint Debtors.

Chapter 7
Case No. 19-54531
Hon. Phillip J. Shefferly

DEBTORS' OBJECTION TO TRUSTEE'S MOTION TO COMPEL

Debtors state:

1. Debtor Joseph DuMouchelle has indicated that he is in the process of complying with the Trustee's subpoena, however, his ability to gather documents is hampered by various matters including the Covid virus and getting information from others whose schedule has been affected by the virus.
2. Debtors sought an extension to May 18 to provide the requested documents and have indicated that they are in the process of gathering and disseminating the documents.
3. Debtors do not believe that a sanction for a significant dollar amount or otherwise is appropriate in light of the circumstances.

WHEREFORE, this Court should deny the Trustee's motion to compel.

Respectfully submitted,
/s/ Robert N. Bassel
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Counsel for Debtors

Dated: 5.20.2020

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**PROOF OF SERVICE OF
DEBTORS' OBJECTION TO TRUSTEE'S MOTION TO COMPEL**
Debtors state,

1. I served a copy of the above-referenced document upon counsel of record via the ECF system on 5.20.2020:

Respectfully submitted,
/s/ Robert N. Bassel
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